

**IN THE UNITED STATES  
DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**UNITED STATES OF  
AMERICA,**

**V.**

**CHRISTOPHER IMAN ULMER,  
DEFENDANT.**

**CASE NUMBER**

**2:06-CR-169-WHA**

**MOTION TO EXTEND PRETRIAL  
MOTIONS' DEADLINE**

**COMES NOW**, the defendant, Christopher Ulmer, by and through the undersigned counsel, Daniel G. Hamm, and moves this Honorable Court to issue an Order extending the date by which pretrial motions must be filed pursuant to this Court's Order on Arraignment by stating the following:

1. The deadline for filing pretrial motions is March 29, 2007.
2. Defendant's case is set for trial on the June 4, 2007 Trial Term.
3. There are currently fourteen (14) defendants in this case and the

discovery is voluminous. Counsel has now received the following discovery:

- a. 10 DVD's
- b. 19 CD's
- c. 1 Floppy Disc
- d. 6 VHS Videos
- e. 23 Audio Cassette Tapes
- f. 7,428 Pages of Discovery

4. In order to prepare a proper defense, Counsel will need additional time to review the discovery in its entirety prior to preparing any pretrial motions.

5. The Government has no objections to said continuance.

**WHEREFORE**, the premises considered, Defendant moves this Honorable Court to issue an Order extending the deadline for filing pretrial motions in this case.

**RESPECTFULLY SUBMITTED** this the 19th day of March, 2007.

[/s/ Daniel G. Hamm](#)

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## CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of this Motion to Extend Pretrial Motions' Deadline by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorney named below.

**DONE** this the 19th day of March, 2007.

/s/ Daniel G. Hamm

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